Bill Owens, Governor Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department of Public Health and Environment

December 11, 2002

Ms. Bonita Lavelle **EPA Region 8** 999 18th Street, Suite 500 Denver, CO 80202-2466

Re: Draft Final Feasibility Study Report Addendum for OU1, Vasquez Blvd/I-70 Superfund Site,

Denver, Colorado.

Dear Ms. Lavelle:

The Colorado Department of Public Health and Environment ("the Department") has received and reviewed the above-referenced document. The document clearly presents the new alternative (Alternative 6) and makes the required comparisons, however the Department believes that a stronger case could be made to support the new alternative. The quantitative aspects of each alternative are strongly presented, but the qualitative points are underdeveloped. Since the strength of the supporting language will directly affect the acceptance or rejection of the proposed cleanup numbers (70ppm As and 400ppm Pb), it would be beneficial to develop language to support Alternative 6 now. For example, the new alternative provides greater long-term protectiveness, better addresses cumulative risk issues that are of concern to the community and state concerns that have been expressed wince the beginning of the project (i.e. equal cleanup for neighboring communities). Alternative 3 is presented as the "correct" choice, leading one to wonder why EPA has gone to such great lengths to include another alternative that does not merit consideration.

The Department has attached a few specific comments. Please do not hesitate to call me at (303) 692-3395 if you have any questions.

Sincerely,

Barbara O'Grady State Project Manager

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Attachment

Cc: Ginny Brannon